

There are no discovery concerns at this time.

3. Plans to Address Outstanding Discovery

Arkema is making a witness available to Union Pacific for a deposition on August 30, 2018.

4. Estimate of Time to Address Concerns

There are no outstanding discovery concerns.

Respectfully submitted,

/s/ Jason D. Tutrone
Jeffrey O. Moreno
Jason D. Tutrone
Thompson Hine LLP
1919 M St. NW, Suite 700
Washington, DC 20036
(202) 331-8800

Counsel for Arkema Inc.

Date: August 9, 2018

Certificate of Service

I certify that, on August 9, 2018, I caused a copy of the foregoing document to be served by e-mail on counsel for all parties of record in this proceeding and on the Honorable John P. Dring of the Federal Energy Regulatory Commission.

/s/ Jason D. Tutrone
Jason D. Tutrone